

EXHIBIT A

ROBERT E. TAYLOR, JR., ESQ.- Attorney ID No.: 038691999
535 Boulevard
Kenilworth, New Jersey 07033
(908) 964-3999

Attorney for Plaintiff:
BRITTANY POPE

BRITTANY POPE,

Plaintiff(s),

v.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: ESSEX COUNTY
DOCKET NO: ESX-L-

CIVIL ACTION

WALMART, RODNEY M. HUNTER,
JR., RICHARD ROE(S) and/or
XYZ COMPANY(S), (said names
being fictitious),

COMPLAINT AND JURY DEMAND

Defendant(s).

Plaintiff Brittany Pope, residing at 443 Kerrigan Boulevard,
Apartment 1L, Newark, New Jersey, by way of Complaint against
the defendant(s) says:

FIRST COUNT

1. On or about June 30, 2020 plaintiff BRITTANY POPE was
a business invitee on the premises of defendants WALMART,
RICHARD ROE(S) and/or XYZ COMPANY(S), located at 900 Springfield
Road, Union, NJ.

2. At all times relevant hereto defendants RODNEY M.
HUNTER, JR. and/or RICHARD ROE(S) were also on the aforesaid
premises.

3. At all times relevant hereto defendants RODNEY M. HUNTER, JR. and/or RICHARD ROE(S) did maliciously strike the plaintiff, BRITTANY POPE.

4. As a result of said incident, plaintiff BRITTANY POPE suffered severe and grievous injuries, pain and suffering, bodily injuries, emotional and mental trauma resulting in damages. Plaintiff was and will be prevented from attending to usual pursuits and was compelled to undergo great expense in procuring medical services and supplies in endeavoring to effect a cure or relief for the injuries and has suffered and will continue to suffer losses and expenses and loss of earnings.

WHEREFORE plaintiff BRITTANY POPE demands judgment against defendants RODNEY M. HUNTER, JR., RICHARD ROE(S) and/or XYZ COMPANY(S), individually, jointly, severally or in the alternative, for damages, compensatory and punitive, together with medical bills, interest, attorneys' fees, and costs of suit and other relief the court may deem just.

SECOND COUNT

5. Plaintiff BRITTANY POPE repeats and incorporates herein each and every allegation contained in the Complaint as if set forth fully herein.

6. At all times relevant hereto defendants RODNEY M. HUNTER, JR. and/or RICHARD ROE(S) did negligently, carelessly

and/or recklessly struck, pushed and/or otherwise contacted the plaintiff during their interaction.

7. As a result of said incident, plaintiff BRITTANY POPE suffered severe and grievous injuries, pain and suffering, bodily injuries, emotional and mental trauma resulting in damages. Plaintiff was and will be prevented from attending to usual pursuits and was compelled to undergo great expense in procuring medical services and supplies in endeavoring to effect a cure or relief for the injuries and has suffered and will continue to suffer losses and expenses and loss of earnings.

WHEREFORE plaintiff, BRITTANY POPE, demands judgment against defendants RODNEY M. HUNTER, JR., RICHARD ROE(S) and/or XYZ COMPANY(S), individually, jointly, severally or in the alternative, for damages, compensatory and punitive, together with medical bills, interest, attorneys' fees, and costs of suit and other relief the court may deem just.

THIRD COUNT

8. Plaintiff BRITTANY POPE repeats and incorporates herein each and every allegation contained in the Complaint as if set forth fully herein.

9. At all times relevant hereto, the subject premises were owned, managed, supervised, maintained, leased, serviced, secured and or controlled by defendants WALMART, RICHARD ROE(S)

and/or XYZ COMPANY(S) (said names being fictitious) and/or their agents, servants, employees, and representatives, and had a duty, compelled by law, to exercise reasonable care for the safety of patrons entrusted to them such as the plaintiff.

10. At all times relevant hereto defendants WALMART, RICHARD ROE(S) and/or XYZ COMPANY(S) (said name being fictitious), its agents, servants, employees and representatives were negligent, careless and/or reckless in that they allowed the plaintiff to be struck, pushed and/or otherwise shoved on the subject premises.

11. At all times relevant hereto defendants WALMART, RICHARD ROE(S) and/or XYZ COMPANY(S) (said names being fictitious), its agents, servants, employees and representatives were negligent in the general care, maintenance and supervision of the premises and its patrons, failed to provide plaintiff and its patrons with a safe place, created and/or allowed a dangerous condition of the premises to occur and remain unabated, failed to provide adequate warnings of the dangerous condition of the premises, failed to supervise and maintain control over its patrons and/or employees, failed to adequately and appropriately hire and/or retain its employees, and were otherwise negligent, careless and reckless.

12. As a result of the negligence of the aforesaid defendants, plaintiff BRITTANY POPE suffered severe and grievous injuries, pain and suffering, bodily injuries, emotional and mental trauma resulting in damages. Plaintiff was and will be prevented from attending to usual pursuits and was compelled to undergo great expense in procuring medical services and supplies in endeavoring to effect a cure or relief for the injuries and has suffered and will continue to suffer losses and expenses and loss of earnings.

WHEREFORE plaintiff BRITTANY POPE demands judgment against defendants WALMART, RICHARD ROE(S) and/or XYZ COMPANY(S) (said name being fictitious), individually, jointly, severally or in the alternative, for damages, together with medical bills, interest, attorneys fees, and costs of suit and other relief the court may deem just.

JURY DEMAND

Plaintiff(s) hereby demand(s) trial by jury.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, notice is hereby given that Robert E. Taylor, Jr., Esq. is designated as trial counsel in the within matter.

NOTICE OF TIME UNIT RULE

Plaintiff hereby notifies all named defendants that the TIME UNIT RULE shall be utilized at the time of trial.

DEMAND FOR DISCOVERY OF INSURANCE COVERAGE

Pursuant to Rule 4:10-2(b), demand is made that EACH DEFENDANT disclose to plaintiff's attorney whether or not there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or indemnify or reimburse for payments made to satisfy the judgment and provide plaintiff's attorney with true copies of those insurance agreements or policies, including, but not limited to, any and all declaration sheets. This demand shall include and cover not only primary coverage, but also any and all excess, catastrophe and umbrella policies.

NOTICE PURSUANT TO RULE 1:5-1(a) AND RULE 4:17-4(c)

Pursuant to Rule 1:5-1(a) and Rule 4:17-4(c), the undersigned attorney for plaintiff hereby demands that each party to this action serving pleadings and discovery demands and receiving answers thereto, serve copies of all such pleadings and discovery responses received from any party, including any documents, papers and other material referred to therein, upon the undersigned attorneys. Please take notice that this is a continuing demand.

DEMAND FOR ANSWERS TO UNIFORM INTERROGATORIES

PLEASE TAKE NOTICE that pursuant to Rule 4:17, the undersigned demands certified answers to FORM C and FORM C (1) UNIFORM INTERROGATORIES from EACH DEFENDANT within the time required by Law.

CERTIFICATION- NOTICE OF OTHER ACTIONS

I hereby undersigned certify that the matter is not the subject of any other pending or contemplated court action or arbitration nor am I presently aware of any other party who should be joined in this action.

ROBERT E. TAYLOR, JR., ESQ.
Attorney for plaintiff(s):
BRITTANY POPE

By: 

ROBERT E. TAYLOR, JR., ESQ.

Dated: 5.18.21

Civil Case Information Statement

Case Details: ESSEX | Civil Part Docket# L-003943-21

Case Caption: POPE BRITTANY VS HUNTER RODNEY

Case Initiation Date: 05/18/2021

Attorney Name: ROBERT E TAYLOR JR

Firm Name: ROBERT E. TAYLOR, JR, ATTORNEY AT
LAW

Address: 535 BLVD

KENILWORTH NJ 07033

Phone: 9089643999

Name of Party: PLAINTIFF : Pope, Brittany

Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

Are sexual abuse claims alleged by: Brittany Pope? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

05/18/2021

Dated

/s/ ROBERT E TAYLOR JR

Signed